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WASHINGTON, D.C.

April 29, 2025

*Via ECF*

Hon. Louis L. Stanton  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: *The City of New York v. Magellan Technology, et al.*, No. 23-5880-LLS-OTW**

Dear Judge Stanton:

We represent Defendants Magellan Technology, Inc., Ectoworld, LLC d/b/a Demand Vape, and Matthew J. Glauser (collectively, "Defendants"), in the above-referenced matter. We write, with Plaintiff's consent, pursuant to Individual Practice Rules 1.A and 1.E, and L.R. 7.1(d), to request a ninety-day extension of time to complete discovery from May 1, 2025, to July 30, 2025. This is the first request to extend time to complete discovery.

The parties have been actively engaged in discovery, including the exchange of discovery requests, document productions, and depositions. However, the parties will be unable to complete discovery by the current deadline of May 1, 2025. The parties believe an additional ninety days will provide adequate time to complete necessary discovery. Accordingly, Defendants, with the consent of the City, request the Court extend the deadline to complete fact discovery ninety days to July 30, 2025. Defendants have attached a proposed revised scheduling order to reflect the remaining case affected by the requested extension.

If the above is satisfactory to the Court, Defendants respectfully request that the requested extension of time to complete discovery be "So Ordered."

Thank you for your attention to this matter.

Respectfully submitted,

/s/Eric N. Heyer

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cc: All counsel of record (via ECF)